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15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re
18 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

19 Debtor and
20 Debtor in Possession.

Case No. 23-30564

Chapter 11

**JOINT STATEMENT OF DEBTOR AND
COMMITTEE IN RESPONSE TO UNITED
STATES TRUSTEE'S SUPPLEMENTAL
BRIEF IN SUPPORT OF UNITED STATES
TRUSTEE'S MOTION FOR ORDER
APPOINTING FEE EXAMINER**

[No Hearing Requested]

24 The Roman Catholic Archbishop of San Francisco, the debtor and debtor in possession (the
25 "RCASF" or the "Debtor") in the above-captioned chapter 11 case (the "Bankruptcy Case"), and
26 the Official Committee of Unsecured Creditors (the "Committee"), by its undersigned counsel,
27 submit this joint statement in response to the *United States Trustee's Supplemental Brief in Support*

1 of United States Trustee's Motion for Order Appointing Fee Examiner [ECF No. 493] filed on
2 February 21, 2024 (the "Supplemental Fee Examiner Brief").

3 The Debtor and the Committee have (a) reviewed the Supplemental Fee Examiner Brief filed
4 by Tracy Hope Davis, United States Trustee for Region 17, (b) evaluated all of the proposed fee
5 examiner candidates, and (c) met and conferred regarding the proposed appointment of these
6 candidates.

7 Upon meeting and conferring, the Debtor and the Committee believe that under the
8 circumstances, Elise S. Frejka ("Ms. Frejka") of Frejka PLLC is the most appropriate candidate to
9 be appointed as fee examiner in the Bankruptcy Case.

10 The Debtor and Committee understand that Ms. Frejka is willing to provide fee examiner
11 services in this Bankruptcy Case under a compensation structure of \$530/hour and reimbursement
12 of actual expenses, subject to Court approval under standards analogous to sections 327, 330 and
13 331 of the Bankruptcy Code.

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1 The Debtor and Committee support Ms. Frejka's appointment on such terms.
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4 Dated: February 26, 2024

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

6 By /s/ Paul J. Pascuzzi

7 PAUL J. PASCUZZI
8 JASON E. RIOS
9 THOMAS R. PHINNEY
Attorneys for The Roman Catholic
Archbishop of San Francisco
10

11 Dated: February 26, 2024

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

13 By /s/ Ori Katz

14 ORI KATZ
15 ALAN H. MARTIN
Attorneys for The Roman Catholic
Archbishop of San Francisco
16

17 Dated: February 26, 2024

PACHULSKI STANG ZIEHL & JONES LLP

19 By /s/ James I. Stang

20 JAMES I. STANG
21 BRITTANY M. MICHAEL (admitted *pro hac vice*)
22 Counsel to the Official Committee of Unsecured
23 Creditors
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